

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

_____)	
John Hancock Life Insurance Company, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 03-12501-DPW
)	
Abbott Laboratories,)	
)	
Defendant.)	
_____)	

**PLAINTIFFS' MOTION TO SEAL
PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO COMPEL
DEFENDANT ABBOTT LABORATORIES TO PRODUCE DOCUMENTS AND
PROVIDE SUBSTANTIVE RESPONSES TO CERTAIN DISCOVERY REQUESTS**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "John Hancock") hereby move this Court for leave to file the following document under Seal: Plaintiffs' Memorandum in Support of Their Motion to Compel Defendant Abbott Laboratories to Produce Documents and Provide Substantive Responses to Certain Discovery Requests ("Plaintiffs' Memorandum in Support").

Plaintiffs filed their Memorandum in Support with the Court electronically yesterday, on July 29, 2004. Last evening, counsel for Abbott Laboratories ("Abbott") contacted counsel for John Hancock and informed John Hancock of Abbott's position that Plaintiffs' Memorandum in Support contains confidential, proprietary information, and therefore should have been filed under Seal. Abbott confirmed its position in a letter to John Hancock later last evening, and requested that John Hancock immediately withdraw the Memorandum in Support from the

public court file and re-file it in accordance with the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004.

John Hancock consulted with Abbott pursuant to Local Rule 7.1(A)(2) on July 30, 2004, and Abbott confirmed its request that Plaintiffs file this Motion to Seal.

In accordance with Abbott's request to John Hancock, John Hancock respectfully requests that it be granted leave to re-file, under Seal, Plaintiffs' Memorandum in Support of Their Motion to Compel Defendant Abbott Laboratories to Produce Documents and Provide Substantive Responses to Certain Discovery Requests, which was filed electronically on July 29, 2004, and that Plaintiffs' Memorandum in Support be impounded until further Order of the Court.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE LIFE
INSURANCE COMPANY, AND INVESTORS
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Raymond A. O'Brien

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Dated: July 30, 2004

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company conferred with Abbott Laboratories' counsel on July 30, 2004, and that Abbott Laboratories requested that Plaintiffs file this Motion to Seal.

/s/ Raymond A. O'Brien